

1 ELIZABETH A. STRANGE
2 First Assistant United States Attorney
3 District of Arizona
4 REBECCA J. SABLE
5 Assistant U.S. Attorney
6 United States Courthouse
7 405 W. Congress Street, Suite 4800
Tucson, Arizona 85701
Telephone: 520-620-7300
Email: rebecca.sable@usdoj.gov
Attorneys for Plaintiff

7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE DISTRICT OF ARIZONA

9 United States of America,

10 Plaintiff,

11 vs.

13 Alvaro Corona-Acosta,

14 Defendant.

CR 18-01751-TUC-RCC (DTF)

1 GOVERNMENT'S SENTENCING
2 MEMORANDUM

15 The United States of America, by and through its undersigned attorneys, hereby
16 files this sentencing memorandum concurring with Probation's recommendation of a
17 sentence of eight months, followed by a one year term of supervised release. Sentencing is
18 set for December 13, 2018 at 9:50 a.m. before the Honorable Judge Raner C. Collins.

19 **Presentence Report Calculations**

20 The presentence report (PSR) identifies a total offense level of 8 and a criminal
21 history category III for the defendant. The government agrees with these calculations. The
22 plea agreement range is 2 to 8 months.

23 **Sentencing Factors**

24 The defendant has three prior misdemeanor convictions for Illegal Entry by Alien.
25 PSR ¶¶ 18-20. He was sentenced to 180 days imprisonment on his most recent conviction
26 on November 28, 2017. PSR ¶ 20. He was thereafter deported on May 15, 2018. He was
27 found in the United States in this case on August 10, 2018. PSR ¶ 3. The defendant has
28 five prior deportations. PSR ¶ 26. The defendant's family lives in Mexico. PSR ¶¶ 27-29.

1 **Recommendation**

2 The government requests a sentence of eight months, followed by a one year term
3 of supervised release. Such a sentence promotes respect for the law, deters the defendant
4 from committing future crimes and protects the public.

5 Respectfully submitted this 7th day of December, 2018.

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7 ELIZABETH A. STRANGE
8 First Assistant United States Attorney
9 District of Arizona

10 *s/Rebecca J. Sable*
11 REBECCA J. SABLE
12 Assistant U.S. Attorney

13 Copy of the foregoing served electronically or by
14 other means this 7th day of December, 2018, to:

15 Jose H. Robles
16 Attorney for Defendant

17 Christina D. Larson
18 U.S. Probation Officer